

### REMARKS

Applicants respectfully request reconsideration of this application, and reconsideration of the Office Action dated June 9, 2005.

With regard to the 35 USC § 112 rejections, claims 21-24 have been amended to eliminate the phrase "by turns". This phrase resulted from a poor translation into English. The intent of the phrase was to convey the concept (shown in patent application figure 8, annotated below) that short and long members are interspersed with one another.

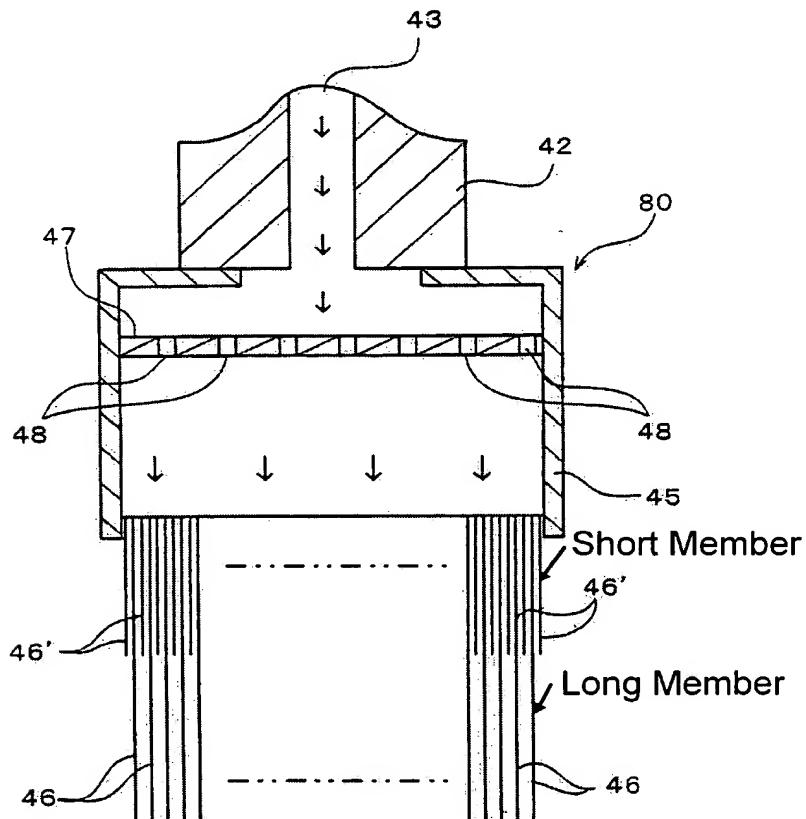


FIG. 8

In our claims, the "first group" includes the longer members and the "second group" includes the shorter members. The claim language should now be clear.

Claims 3, 5, 7, and 21 stand rejected under 35 USC § 103 as being unpatentable over Bolton et al (US Patent 6,131,233) in view of Reynolds (US Patent 4,066,366) and further in view of Allaire et al (US Patent 3,827,099). This ground of rejection is respectfully traversed.

As pointed out above, with respect to the section 112 rejection, the claims have been amended to more clearly describe the long and short elements structural arrangement. Our claimed structural arrangement makes it possible to provide a downward flow of cleaning fluid ejected from the short elements. This flow washes away particles adhering to the surface of the long elements. None of the cited references teach this limitation, now more clearly described in our claims. Using the structural arrangements taught by these references it is difficult to wash the side surface of the thready members. Thus, it is possible to contaminate substrates with particles which were once adhered to the surface of the thready members.

In addition to the claim changes directed to the structural arrangement of long and short members, the claims have also been limited in their application to a "semiconductor wafer" or "LCD substrate glass".

Applicant appreciates the Examiner's indication of allowable subject matter in claims 14-19, 23 and 24 based on the inclusion of the "scrub arm" feature.

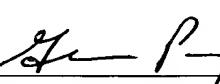
Applicants respectfully submit that this Amendment and the above remarks obviate all of the outstanding rejections in this case, thereby placing the application in condition for allowance. Allowance of this application is earnestly solicited.

If any fees are due in connection with the filing of this Amendment, such as fees under 37 C.F.R. §§1.16 or 1.17, please charge the fees to Deposit Account 02-4300; Order No. 033082.102.

Respectfully submitted,

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